

Written Submission on the Amendment of Nutrition Labeling and Nutrition Claim Regulation 2008.

Submission by Dr. Susan Lui, (Registered Dietitian, PhD) Secretary General of Asian Federation of Dietetic Association

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As a dietitian working in Hong Kong, I fully support the regulation of Nutrition Labeling and Nutrition Claim. However, the amended nutrition labeling of energy plus seven core nutrients namely, protein, carbohydrates, total fat, saturated fat, trans fat, sodium and sugars does not include potassium, calcium and phosphorus which are important for the renal patients. They will be deprived of foods that they like which we can adjust the portion size according to their diet if those information is available. Without those information it is difficult for our professionals to recommend suitable food for our patients especially diet restriction plays an important part in their health and diseases.

Nutrition claims are marketing strategy but some nutrition claimed products are low in one nutrient but high in other (e.g. low sugar products maybe high in fat) which can be deceptive. Food with claims does not mean that they are healthy. Many consumers are attracted by those claims and unaware of the nutrient contains of the product. If a food with nutrition claim is a healthy food, the nutrition label will help their marketing. As a dietitian, I am willing to suggest to my clients to consume those healthy products which in return will increase their sales. If adding a nutrition label will help the marketing, I do not see why trades are against it unless they do not have confident in their products.

I strongly object to the exemption of the small volume from the nutrition claims. As long as they carry a claim, there should be a nutrition label of the claimed nutrients and other core nutrients to avoid misleading. This should be applied to all foods with claims. This is in line with international nutrition claim standards.

I would like to suggest for those products using %NRV (Nutrient Reference Value) should state their NRV level as different country has their owe NRV level. For example, Vitamin C in Chinese NRV is 100mg, whereas USA is 60mg thus Australia and New Zealand is 40mg. If a product labeled as 100% NRV can be less than 50%NRV of the Chinese NRV. This can be deceptive to our consumer.

Thank you.